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POLICE DEPARTMENT OF THE CITY OF BURBANK (erroneously sued as an
independent entity named “BURBANK POLICE DEPARTMENT”)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

OMAR RODRIGUEZ; CINDY GUILLEN-
GOMEZ; STEVE KARAGIOSIAN; ELFEGO
RODRIGUEZ; AND JAMAL CHILDS,

Plaintiffs,

v.

BURBANK POLICE DEPARTMENT; CITY
OF BURBANK; AND DOES 1 THROUGH
100, INCLUSIVE,

Defendants.

BURBANK POLICE DEPARTMENT; CITY
OF BURBANK,

Cross-Complainants,

v.

OMAR RODRIGUEZ, an Individual;

Cross-Defendant.

CONFORMED COPY
OF ORIGINAL FILED
Los Angeles Superior Court

MAY 07 2010

John A. Clarke, Executive Officer/Clerk

By Raul Sanchez Dept.

Case No. BC 414602

Date: May 12, 2010

Time: 9:00 a.m.

Judge: The Honorable Joanne O'Donnell

Dept.: 37

**NOTICE OF LODGING DEPOSITION
TRANSCRIPTS FOR DEFENDANT IN
SUPPORT OF ITS MOTION FOR
SUMMARY JUDGMENT, OR IN THE
ALTERNATIVE, SUMMARY
ADJUDICATION OF ISSUES AGAINST
PLAINTIFF ELFEGO RODRIGUEZ**

[Reply Brief, Consolidated Separate Statement,
Evidentiary Objections, [Proposed] Order Re
Evidentiary Objections, Responses To
Plaintiff's Objections, Appendix Of
Non-California Authorities, And Reply
Declaration Of Veronica Von Grabow Filed
Concurrently Herewith]

File Date: May 28, 2009

Trial Date: August 25, 2010

Discovery Referee: Hon. Diane Wayne, Ret.

1 **PLEASE TAKE NOTICE** that Defendant City of Burbank, including the Police
2 Department of the City of Burbank (erroneously sued as an independent entity named "Burbank
3 Police Department") ("Defendant") hereby lodges the following certified deposition transcripts of
4 Elfego Rodriguez:

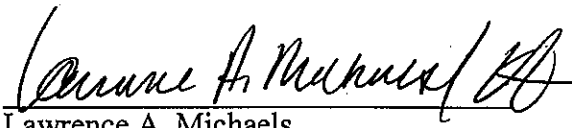
5
6 (1) A certified copy of the deposition transcript of Elfego Rodriguez, Volume I, dated
7 August 10, 2009, with exhibit; and

8 (2) A certified copy of the deposition transcript of Elfego Rodriguez, Volume II, dated
9 October 8, 2009; with exhibit and

10 (3) A certified copy of the deposition transcript of Elfego Rodriguez, Volume III, dated
11 January 11, 2010., with exhibit.

12
13
14 Dated: May 7, 2010

MITCHELL SILBERBERG & KNUPP LLP
Lawrence A. Michaels

15
16
17 By: 
18 Lawrence A. Michaels
19 Attorneys for Defendant and Cross-
20 Complainant CITY OF BURBANK,
21 including the POLICE DEPARTMENT OF
22 THE CITY OF BURBANK (erroneously
23 sued as an independent entity named
24 "BURBANK POLICE DEPARTMENT")
25
26
27

1 **PROOF OF SERVICE**

2 42729-00001

3 *Rodriguez, et al. vs. Burbank Police Department, et al. — LASC Case No. BC414602*

4 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

5 I am employed in the county of Los Angeles, State of California. I am over the age of 18
6 and not a party to the within action. My business address is Mitchell Silberberg & Knupp LLP,
11377 West Olympic Boulevard, Los Angeles, California 90064-1683.

7 On May 7, 2010, I served a copy of the foregoing document(s) described as: **NOTICE OF**
8 **LODGING DEPOSITION TRANSCRIPTS FOR DEFENDANT IN SUPPORT OF ITS**
9 **MOTION FOR SUMMARY JUDGMENT, OR IN THE ALTERNATIVE, SUMMARY**
10 **ADJUDICATION OF ISSUES AGAINST PLAINTIFF ELFEGO RODRIGUEZ** on the
interested parties in this action at their last known address as set forth below by taking the action
described below:

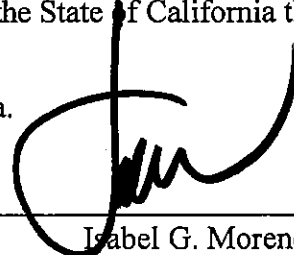
11 Solomon E. Gresen, Esq.
12 Steven V. Rheuban, Esq.
13 Law Offices of Rheuban & Gresen
15910 Ventura Boulevard, Suite 1610
14 Encino, CA 91436
T: (818) 815-2727 — F: (818) 815-2737

15 *Attorneys for Plaintiffs Omar Rodriguez, Cindy Guillen-Gomez,*
16 *Steve Karagiosian, Elfego Rodriguez, and Jamal Childs*

17 ☒ **BY PERSONAL DELIVERY:** I placed the above-mentioned document(s) in sealed
18 envelope(s), and caused personal delivery by **FIRST LEGAL SUPPORT SERVICES** of
19 the document(s) listed above to the person(s) at the address(es) set forth above.

20 I declare under penalty of perjury under the laws of the State of California that the above is
true and correct.

21 Executed on May 7, 2010, at Los Angeles, California.

22 
23 _____
Isabel G. Moreno

PROOF OF SERVICE

42729-00001

Rodriguez, et al. vs. Burbank Police Department, et al. — LASC Case No. BC414602

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California.

I am over the age of 18, and not a party to the within action; my business address is **FIRST LEGAL SUPPORT SERVICES**, 1511 West Beverly Boulevard, Los Angeles, California 90026.

On May 7, 2010, I served the foregoing document(s) described as **NOTICE OF LODGING DEPOSITION TRANSCRIPTS FOR DEFENDANT IN SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT, OR IN THE ALTERNATIVE, SUMMARY ADJUDICATION OF ISSUES AGAINST PLAINTIFF ELFEGO RODRIGUEZ** which was enclosed in sealed envelopes addressed as follows, and taking the action described below:

Solomon E. Gresen, Esq.
Steven V. Rheuban, Esq.
Law Offices of Rheuban & Gresen
15910 Ventura Boulevard, Suite 1610
Encino, CA 91436
T: (818) 815-2727 — F: (818) 815-2737

*Attorneys for Plaintiffs Omar Rodriguez, Cindy Guillen-Gomez,
Steve Karagiosian, Elfego Rodriguez, and Jamal Childs*

☒ **BY PERSONAL SERVICE:** I hand delivered such envelope(s):

☐ to the addressee(s);

☒ to the receptionist/clerk/secretary in the office(s) of the addressee(s).

☐ by leaving the envelope in a conspicuous place at the office of the addressee(s) between the hours of 9:00 a.m. and 5:00 p.m.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on May 7, 2010, at Los Angeles, California.

Omar Eason
Printed Name

Omar Eason
Signature